IRIS ENVIRONMENTAL

Via Email and US Mail

May 29, 2008

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Katherine Baylor, P.G., Hydrogeologist
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Re: Proposed Investigation Tasks Summary
Consent Order, Docket No RCRA (AO)-09-2008-03
Former Romic Environmental Technologies Corp. Facility
Chandler, Arizona

Dear Mr. Moody and Ms. Baylor:

On behalf of Romic Environmental Technologies Corp. ("Romic"), and pursuant to paragraphs 31 and 32 of the above-referenced Administrative Order on Consent, Iris Environmental ("Iris") has compiled a summary of proposed investigation tasks for the Romic Facility as a continuation of recent investigation and monitoring activities on and around the facility.

Preliminary data generated during the recent initial soil gas sampling event conducted in April, 2008 (*Revised Initial Soil Gas Sampling Work Plan*, April 14, 2008, Iris Environmental) indicates the presence of volatile organic compounds (VOCs) in shallow soils over portions of the Facility that appear to be related to pre-Romic operations. Timely removal of these vapors will facilitate site corrective action and Facility closure. Therefore, a soil vapor extraction well was installed during the soil gas sampling event to prepare for the pilot testing needed for designing a soil vapor extraction (SVE) system at the Facility. Additional subsurface sampling is also being proposed.

The following list of actions, work plans, and reports represent the proposed near term activities.

1. **Prepare Soil Gas Sampling Report**

   A report presenting the findings of the April soil gas sampling (SGS) work is currently being prepared and is scheduled for submittal in early June. ASAP

2. **Prepare Preliminary Current Conditions and Data Gap Report** End of August

   A preliminary report summarizing what is known of the current site conditions will be prepared to establish a basis for planning and identifying data gaps. Data gaps identified though development of the report will be used to scope the next investigation steps. The current conditions report may subsequently be updated when either new data are generated or remedial site activities completed.

3. **Perform Boring for Deep Soil Gas Sampling, Grab Groundwater Sampling and Aquifer Characterization** WP draft 1 Aug

   The recent shallow soil gas sampling confirmed the presence of VOCs in soil gas beneath certain areas of the Facility. The next step in the investigation of soil gas is to collect samples deeper than 15 feet and down towards the groundwater interface. Select borings will be extended into groundwater in order to collect grab groundwater samples for laboratory analysis. At least one boring will be extended down to a depth adequate to identify the base of the uppermost aquifer. A separate sampling work plan will be prepared to describe the methods and procedures for sampling and then submitted for agency review.

4. **Conduct Limited Soil Vapor Extraction Pilot Test** WP draft Aug 15

   A SVE test well was installed during the soil gas sampling mobilization in anticipation of conducting a brief SVE pilot test. Data from the pilot test will be used to design a larger scale SVE system to mitigate VOCs in vapor beneath the Facility. A work plan for SVE pilot testing will be prepared and then submitted for agency review.

5. **Design Remedial Soil Vapor Extraction System** Fall 08

   Results of the SVE pilot test will be used in conjunction with the deep soil gas sampling data to design the SVE system. The system will likely be configured to accelerate removal of VOCs from beneath the Facility without modification of the existing infrastructure. A design package will be prepared and then submitted for agency review.

6. **Develop Conceptual Site Model for Allison Road Groundwater Investigation** Sept. 15

   Findings from the site investigation activities combined with the current conditions report will be used to develop a conceptual site model (CSM) to provide a basis for interpreting groundwater conditions and to identify optimal locations for groundwater investigation in the

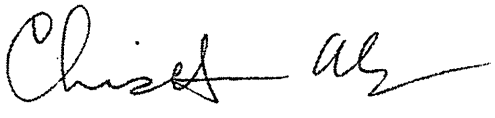
Allison Road area. Development of the CSM will be concurrent with the work described above. A graphical and narrative CSM will be submitted for agency concurrence and planning discussions for future groundwater investigation activities.

The six tasks will be conducted in relatively sequential order. As noted above, the SGS report is currently in progress and is scheduled for completion in June. Preparation of a current conditions report is just beginning and is anticipated to be completed in late June or early July. A work plan for deep sampling should be completed at the same time. Field work for the boring program will began after agency concurrence with the scope and procedures. The SVE pilot test will take place as soon as the deep soil gas sampling is completed and the scope has been approved. SVE system design and preparation of the CSM will likely be completed during the fall of this year. Task specific reports and work plans will be submitted as they are prepared.

Please do not hesitate to contact me at (510)-834-4747 x21 or calger@irisenv.com if you have any questions or comments regarding this correspondence.

Sincerely,

IRIS ENVIRONMENTAL



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cc: Glenn Stark, Gila River Indian Community Department of Environmental Quality
Esther Manuel, Lone Butte Industrial Development Corporation
Wayne Kiso, Clarus Management Solutions